

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
TRI-STATE PAPER, INC.	:	Chapter 11
Debtor	:	Case No. 23-13237-pmm
	:	
	:	
	:	

**REPLY TO DEBTOR'S RESPONSE TO PENN JERSEY PAPER CO.'S
MOTION TO HAVE PROOF OF CLAIM FILED OUT OF TIME
DEEMED TIMELY FILED PURSUANT TO F.R.B.P. 9006(b)(1)**

AND NOW COMES Penn Jersey Paper Co. ("Penn Jersey" or "Movant"), by and through its undersigned counsel, Joshua B. Ladov, Esquire, and Ladov Law Firm, P.C., replying to Debtor's Response to Penn Jersey Paper Co.'s Motion to Have Proof of Claim Filed Out of Time Deemed Timely Filed Pursuant to F.R.B.P. 9006(b)(1) (the "Motion") as follows:

1. Debtor's Response opposing Penn Jersey's Motion relies solely upon the alleged lack of excusable neglect as Penn Jersey's justification for its request to have its Proof of Claim be deemed timely filed.
2. Debtor has failed to address the fact that having Penn Jersey's Proof of Claim deemed timely filed has not, and will not, delay the administration of the Debtor's bankruptcy proceeding and/or Plan of Liquidation.
3. The Debtor has failed to address that there are ample funds in the bankruptcy estate to allow Penn Jersey's claim to be liquidated and paid, and that no creditor will be prejudiced thereby.
4. The Debtor has failed to address the fact that allowing Penn Jersey's Proof of Claim to be deemed timely filed will not prejudice the Debtor.
5. The Debtor has failed to address the fact that refusal to have its Proof of Claim deemed timely filed will substantially prejudice Penn Jersey.

6. The Debtor has failed to address the fact that there is nothing to suggest that Penn Jersey has failed to act in good faith when it did not file its claim by the Bar Date.

WHEREFORE, Penn Jersey Paper Co. respectfully requests that this Honorable Court enter an order in the proposed form attached to Penn Jersey's Motion permitting Penn Jersey Paper Co.'s Proof of Claim to be deemed timely filed and for such other and further relief as this Honorable Court deems just and proper.

LADOV LAW FIRM, P.C.

/s/ Joshua B. Ladov
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